

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT FUND OF ILLINOIS, <i>et al.</i> ,	)	
Plaintiffs,	)	CIVIL ACTION
vs.	)	NO. 11 C 1151
AUDITORIUM CHAIRS.COM, INC., a Florida corporation, a/k/a AUDITORIUM CHAIRS,	)	JUDGE BLANCHE M. MANNING
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on May 17, 2011, request this Court enter judgment against Defendant, AUDITORIUM CHAIRS.COM, INC., a Florida corporation, a/k/a AUDITORIUM CHAIRS. In support of this Motion, Plaintiffs state:

1. On May 17, 2011, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.
2. On November 14, 2011, Plaintiffs' auditors completed the audit. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$14,169.88. (See Affidavit of Deborah L. French). A copy of the audit report is attached hereto as Exhibit A.
3. Additionally, the amount of \$4,779.09 is due for liquidated damages. (French Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended the total amount of \$640.00 in costs and \$6,728.75 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. On December 30, 2011, Plaintiffs' counsel sent a letter to Defendant's counsel requesting any disputes or challenges to the audit findings within 21 days. A copy of the December 30, 2011 letter is attached hereto as Exhibit B.

6. On February 7, 2012, Defendant's counsel sent a letter to Plaintiffs' counsel providing a listing, by month, of the Defendant's disputes to the audit findings. A copy of the February 7, 2012 letter is attached hereto as Exhibit C.

7. On March 20, 2012, Plaintiffs' counsel sent a letter to Defendant's counsel requesting Defendant submit revised disputes to the audit findings. A copy of the March 20, 2012 letter is attached hereto as Exhibit D.

8. Since Defendant did not submit revised disputes to the audit findings, based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$26,317.72.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$26,317.72.

/s/ Cecilia M. Scanlon

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## **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 28th day of June 2012:

Ms. Shannon R. Emmerson  
Auditorium Chairs.Com, Inc.  
4705 95th Street N  
St. Petersburg, FL 33708-3723

/s/ Cecilia M. Scanlon

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